

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

DANIEL B. GRAVES, Plaintiff, v. DEUTSCHE BANK SECURITIES, INC., Defendant.	CIVIL ACTION NO. 1:07-cv-05471-BSJ-KNF ECF Case
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**DECLARATION OF RICHARD T. SEYMOUR IN
SUPPORT OF PLAINTIFF'S MOTION FOR
LEAVE TO FILE DOCUMENTS UNDER SEAL,
AND TO CORRECT AN INADVERTENT ERROR**

Washington, D.C., ss:

I make the following declaration subject to the penalties for perjury:

1. I am lead counsel for plaintiff in this action.
2. This case involves the context of investment banking.
3. The numerous documents that are the subject of the Motion fall into several types, each worthy of protection.
4. Some documents concern the performance evaluations of present or former employees of defendant who are not parties to this action, and involve their right to privacy.
5. Some documents concern the compensation of present or former employees of defendant who are not parties to this action, and involve their right to financial privacy.
6. Some documents involve information about individuals and corporations actually or potentially doing business with defendant, with evaluations of their prospects, management teams, and finances. None of these individuals or corporations are parties before the Court.